



Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

October 16, 2013

Re: Modernizing the E-Rate Program for Schools and Libraries - WC Docket No. 13-184

To Whom It May Concern:

The National Center for Learning Disabilities (NCLD) works to ensure that the nation's 15 million children, adolescents and adults with learning difficulties and disabilities have every opportunity to succeed in school, work and life. Since 1977, NCLD has been led by devoted parents and professionals committed to creating better outcomes for children, adolescents and adults with learning difficulties and disabilities (LD). Over 150,000 parents and teachers engage with us and rely on NCLD for information and resources. Today, there are over 2.2 million students receiving special education services in our nation's public schools. In addition, there are over 500,000 students receiving accommodations in school -- with a high proportion reliant on access to technology to help ameliorate the effects of their LD.

Because learning disabilities affect how the brain processes information, most students diagnosed with a learning disability struggle to read (dyslexia), write (dysgraphia) and compute (dyscalculia). In order for students with LD to achieve the most successful academic outcomes, schools must have access to the internet, digital technology and assistive technology devices so these students may fully benefit and participate in our global, digital world. Regardless of school setting, all students should be afforded access to robust digital learning by streamed video, online courseware, virtual field trips, consistent data usage, e-support for their assistive technology devices as well as safe and reliable connections to appropriate internet research. Students with LD in particular benefit academically through the use of technology and digital learning when used and implemented effectively.

NCLD is supportive of the Federal Communication Commission's (FCC) efforts to examine, update and revitalize the E-Rate program; however, due to the extent of the NPRM which includes over 600 questions and anticipates 350 responses, we are focusing our response on the two most fundamental issues that we know will have the highest impact on students with LD. Therefore, we offer the following comments for your consideration:

1. NCLD believes that the E-Rate Program is extremely successful;
2. NCLD believes that the E-Rate current funding level is inadequate to meet current and future demand and urges an increase to at least \$5 billion annually; and

1. NCLD believes that the E-Rate program is extremely successful
NCLD supports the general consensus that since its inception, the E-Rate program has worked with great success to ensure that students and educators are connected to the Internet and have access to online communications services and informational resources no matter where they live or their socioeconomic status. As the Notice makes clear, nearly every classroom has basic internet connectivity and stories abound as to its widespread positive effects on fostering online and digital education, developing critical learning and technical skills, improving access to programs and services, assisting in employment services, and facilitating

communications and collaborations between parents, students, teachers, and communities. While the direct benefit to students with disabilities is not truly quantifiable, we know that within schools and classrooms, when these students have the digital tools they need combined with effective instruction, the academic gains lead to students meeting grade level standards, to their gaining critical thinking and writing skills and graduating from high school with their peers with a regular diploma. When schools have the tools and resources, these outcomes are achievable.

2. NCLD believes that the E-Rate funding level is inadequate to meet current and future demand and urges an increase to at least \$5 billion annually

Paragraphs 172-176 of the FCC Notice raise the issue of E-Rate funding and ask whether the Commission should look to reprioritize current funds, authorize a temporary increase to the E-Rate cap, or authorize a permanent cap raise.

While it is clear that the E-Rate has been incredibly successful, this is a time to strengthen the investment in our students' futures and that investment should be permanent, not temporary. The basic connectivity that E-Rate helped establish within our nation's schools is a beginning but does not fully support the exploding demand for more bandwidth and higher connectivity necessary for the rapid expansion of online tools, services, digital libraries, online textbooks and assessments, and the proliferation of mobile wireless devices. It is apparent that the current program cap is wholly insufficient to meet current applicant demand, which has been more than double available funding in the past two years, let alone anticipated future need.

We propose that the E-Rate's annual spending cap, set in 1998 - before mobile wireless computing devices even existed - merits a significant increase. At a minimum, the increase should meet current application demand levels, which have hovered at about \$5 billion over the past two years. Any increase in the current cap should be made permanent, providing applicants certainty that appropriate levels of funding will be available to them for the program's next 15 years. Without an increase in the program's annual cap, the program's ability to support existing and new services will be severely limited in the next few years, including drastic cuts to essential basic services in Priority 1. If this comes to pass, the program will be unable to provide schools with the advanced telecommunications and information services they need to provide students with the skills necessary to compete in our global world.

By permanently increasing the cap to \$5 billion, the FCC would provide schools and libraries with sufficient funds to meet the growing needs of Priority 1 services and allow the program to also fund Priority 2 services to institutions at lower discount levels. Given the surging use of digital learning tools, resources, devices, and assessments to personalize learning, strengthen instruction and prepare students for college and career, a temporary increase in funding will not be sufficient.

NCLD appreciates this opportunity to comment on this important endeavor.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Wendorf", written in a cursive style.

James H. Wendorf
Executive Director

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